

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Revision of the Commission's Rules to</b>	)	<b>CC Docket 94-102</b>
<b>Ensure Compatibility with Enhanced 911</b>	)	
<b>Emergency Calling Systems</b>	)	

**To: Chief, Wireless Telecommunications Bureau**

**CENTENNIAL COMMUNICATIONS CORP.  
AMENDED REPORT ON E911 DEPLOYMENT REQUIREMENTS**

Centennial Communications Corp. ("Centennial"), by its attorneys and pursuant to Section 20.18(i) of the FCC's rules, and the *Fourth Memorandum Opinion and Order*<sup>1</sup> in this proceeding, hereby amends the Phase II E911 Implementation Plan submitted on November 9, 2000 ("November 9 Report"). This amendment reflects a change in the Phase II E911 technology that Centennial will deploy in its domestic markets. In the November 9 report, Centennial advised the Commission that it intended to deploy Nortel's handset-based solution to comply with the FCC's Phase II E911 requirements. However, as explained below, due to market realities, Centennial is forced to switch from a handset solution to the network-based solution offered by Grayson Wireless.

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<sup>1</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Fourth Memorandum Opinion and Order, 15 FCC Rcd. 17442 (2000) ("*Fourth MO&O*").

Through its domestic subsidiaries<sup>2</sup>, Centennial provides digital cellular service over a TDMA network in 30 MSAs and RSAs in the continental United States. As the Commission now is well aware, handset manufacturers have decided not to produce ALI-capable TDMA handsets.<sup>3</sup> Due to the large carriers' migration to CDMA and GSM networks, and the evolution of 3G, manufacturers believe it is economically impractical for them to produce ALI-capable TDMA handsets. Indeed, all major TDMA carriers are either planning to or actually converting their networks to other digital standards, leading to declining demand for TDMA handsets and their expedited obsolescence. Consequently, Centennial had no choice but to switch to a network-based solution.

This week, Centennial will announce that it will implement Grayson Wireless' "Geometrix" network overlay solution for E911 Phase II compliance in Centennial's domestic markets.<sup>4</sup> Since Grayson's network overlay solution already has been tested and implemented by other CMRS carriers, Centennial is confident that it will not experience significant implementation issues and delays. Therefore, Centennial has developed an E911 Phase II roll-out plan utilizing Grayson's network overlay solution for those Centennial markets where PSAPs have submitted valid requests to implement Phase II service,<sup>5</sup> with activation of the first market (Steuben County, Ohio) planned for late 2002.

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<sup>2</sup> These are Baucse Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

<sup>3</sup> See, e.g., United States Cellular Corporation Petition for Waiver of Sections 20.18 (e) and (g) of the Commission's Rules in CC Docket No. 94-102, at 9-10, dated September 10, 2001; Rural Cellular Corporation, Amended Petition for Temporary Waiver of the E911 Phase II Enhanced Wireless Services in CC Docket No. 04-102, dated April 18, 2002; FCC Public Notice, DA 02-640, "Wireless Telecommunications Bureau Seeks Comment on Petitions for Temporary Waiver of Deadline by Which Digital Wireless Systems Must Be Capable of Transmitting Calls from TTY Devices", dated March 19, 2002.

<sup>4</sup> See Attachment A, press release of Centennial Communications Corp and Grayson Wireless.

<sup>5</sup> At present, Centennial has received valid PSAP requests for five counties in its thirty markets.

Centennial remains fully committed to timely complying with its E911 Phase II obligations, as recently revised by the Commission's *Order to Stay*.<sup>6</sup> With the changes outlined above, Centennial anticipates that it will be able to do so. In addition, Centennial will continue to keep the Commission apprised of any significant developments that occur regarding its Phase II implementation in its domestic markets through the quarterly progress reports that it is required to file pursuant to the Commission's *Stay Order*.<sup>7</sup>

Respectfully submitted,  
**Centennial Communications Corp.**

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September 9, 2002

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<sup>6</sup> *Order to Stay* in CC Docket No. 94-102 ("*Stay Order*"), FCC02-210, released July 26, 2002, at ¶ 26.

<sup>7</sup> *See Stay Order* at ¶¶ 28-30.

## **ATTACHMENT A**



## NEWS Release

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FOR IMMEDIATE RELEASE

### **CENTENNIAL WIRELESS SELECTS GRAYSON WIRELESS TO SUPPLY 911 CALLER LOCATION SYSTEMS**

BEACHWOOD, OHIO September 10, 2002 – Grayson Wireless, a division of Allen Telecom (ALN: NYSE), today announced that Centennial Communications Corp. (NASDAQ: CYCL) has signed an agreement to purchase Grayson's Geometrix<sup>®</sup> wireless 911 caller location systems for installation in Centennial's U.S. wireless network. Centennial's U.S. wireless operations provide digital wireless service to over 540,000 subscribers in six states in two clusters of small cities and rural areas covering a population of 6.0 million. Grayson location systems will be installed in markets selected by Centennial Wireless in response to 911 public safety agency requests for precise caller location information on calls to 911. Grayson will be Centennial's exclusive supplier of 911 location systems for all current and future digital and analog technologies used in Centennial's wireless network in the continental United States.

Grayson's Geometrix systems are compatible with Centennial's current TDMA (digital) and AMPS (analog) wireless network technologies. Geometrix is a network-based system that will locate customers using their current wireless phones, without the need for handset modification or replacement. Centennial also will use the Grayson location systems in its future operations as it upgrades its network to support third generation (3G) technology in the future. Centennial will install the Geometrix systems to comply with the Federal Communication Commission's Phase II E911 regulations. The Grayson system automatically locates and forwards the 911 caller position information to public safety agencies that receive 911 calls.

"Grayson's solution provides Centennial Wireless with a flexible location system that is proven, straightforward to implement and expand, and transparent to our customers," said Jeff Shively, Centennial's Vice President of Engineering. "Grayson Wireless was the clear choice for our 911 location system."

Geometrix location systems will allow Centennial Wireless to provide locations of wireless 911 callers to emergency response centers that are equipped to receive such information. Centennial customers will be able to use their existing handsets and current 911 calling procedures. To maintain caller privacy, Geometrix systems are designed to provide location information only when a caller initiates a 911 call. Geometrix systems are scalable for both large and small applications and are suited to both urban and rural operations. Grayson Wireless is unique among location system vendors in that it has marketed to and installed Geometrix systems for both very large and very small wireless service providers. Grayson has received recognition for its effective efforts to address all segments of the wireless market.

Terry Garner, President of Grayson Wireless, stated, “We look forward to working with Centennial Wireless and to providing them with our Geometrix systems to locate customers in emergency situations. We are prepared to fully support Centennial’s current and future requirements as it brings this enhanced security feature to its customers. We couldn’t be more pleased that Centennial selected Grayson Wireless to supply these systems to benefit public safety.”

Grayson Wireless ([www.geometrix911.com](http://www.geometrix911.com)), a division of Allen Telecom Inc., (NYSE: ALN) designs, builds, and markets the Geometrix system, a state-of-the-art, scalable, cost-effective, network overlay solution intended to allow carriers to meet the FCC’s stringent Phase II requirements for wireless E911 caller location. Geometrix is the first Phase II-compliant wireless location system to be placed into commercial service. Geometrix works with the CDMA, GSM, TDMA, AMPS, and iDEN wireless technologies, and is compatible with existing wireless phones in use in the United States. In addition to meeting FCC E911 requirements, Geometrix can also provide caller-locating support for a wide variety of location-based value-added services.

Allen Telecom Inc. (<http://www.allentele.com>) is a leading supplier of wireless equipment to the global telecommunications infrastructure market. Grayson Wireless supplies measurement and signal processing systems for testing the performance of a wireless network, network-based wireless caller geolocation systems for E 911 and value added services. Comsearch offers program management, network planning, engineering, development and installation of wireless networks worldwide. FOREM supplies sophisticated filters, duplexers, combiners, amplifiers and microwave radios to an array of OEM customers. MIKOM focuses on providing repeaters, in-building systems and other products that enhance both the coverage and the capacity of a wireless system. Tekmar Sistemi provides integrated low power fiber optic and cable distributed antenna systems for indoor coverage systems. Decibel Products and Antenna Specialists manufacture land based and mobile antennas in frequency bands that cover all of the traditional wireless networks.

Centennial Communications Corp, (NASDAQ: CYCL) Centennial is one of the largest independent wireless telecommunications service providers in the United States and the Caribbean with approximately 17.1 million Net Pops and approximately 900,000 wireless subscribers. Centennial’s U.S. operations have approximately 6.0 million Net Pops in small cities and rural areas. Centennial’s Caribbean integrated communications operation owns and operates wireless licenses for approximately 11.1 million Pops in Puerto Rico, the Dominican Republic and the U.S. Virgin Islands, and provides voice, data, video and Internet services on broadband networks in the region. Welsh, Carson Anderson & Stow and an affiliate of the Blackstone Group are controlling shareholders of Centennial. For more information regarding Centennial, please visit our websites at [www.centennialcom.com](http://www.centennialcom.com), [www.centennialwireless.com](http://www.centennialwireless.com) or [www.centennialpr.net](http://www.centennialpr.net).

Statements included in this press release, which are not historical in nature, are forward-looking statements made pursuant to the safe harbor provisions of the Private Securities Litigation Reform Act of 1995. Forward-looking statements regarding the Company’s future performance and financial results are subject to a number of risks and uncertainties that could cause actual results to differ materially from those set forth in the forward-looking statements. Factors that could cause the Company’s actual results to materially differ from forward-looking statements made by the Company, include, among others, the cost, success and timetable for new product development, including specifically products for 3G, E 911 and power amplification; the cost and outcome of pending litigation filed by a competitor in the E911 geolocation business claiming infringement by the Company of intellectual property rights; the health and economic stability of the world and national markets, the cost and availability of capital and financing to the Company and its customers; the uncertain timing and level of purchases of both current products and those under development for current and prospective customers of the Company’s products and services,

the effective realization of inventory and other working capital assets to cash, the collectibility of receivables, the impact of competitive products and pricing in the Company's markets, the future utilization of the Company's tax loss carry forwards and the impact of U.S. and foreign government legislative/regulatory actions, including, for example, the scope and timing of E 911 geolocation requirements in the U.S. markets and spectrum availability and licensing for new wireless applications. Allen Telecom Inc.'s Annual Report on Form 10-K and Quarterly Reports on Form 10-Q contain additional details concerning these factors.

For further information contact:

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**CERTIFICATE OF SERVICE**

I, Theresa Z. Cavanaugh, hereby certify that a true and correct copy of the foregoing  
“Centennial Communications Corp. Amended Report On E911 Deployment Requirements” has  
been hand delivered, this 9<sup>th</sup> day of September, 2002, to the following:

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Federal Communications Commission  
Wireless Telecommunications Bureau  
445 12th Street SW, Room 3C133  
Washington, DC 20554

Patrick Forster  
Federal Communications Commission  
Wireless Telecommunications Bureau  
445 12th Street SW, Room 3A104  
Washington, DC 20554

By: /s/ Theresa Z. Cavanaugh  
Theresa Z. Cavanaugh